



April 24, 2018

Mr. Jason Pelton
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau D, Section B
625 Broadway
Albany, New York 12233-7015

Reference: CLEAN Contract No. N62470-16-D-9008
Contract Task Order WE13

Subject: Letter Work Plan for the 2018 Poly- and Perfluoroalkyl Substances (PFAS) Groundwater Investigation, Facility Wide, Naval Weapons Industrial Reserve Plant (NWIRP) Bethpage, New York

Dear Mr. Pelton:

On behalf of the Department of the Navy, Tetra Tech is submitting the subject document to the New York State Department of Environmental Conservation (NYSDEC). The following are responses to NYSDEC comments dated February 9, 2018. Also attached are the revised subject Work Plan. NYSDEC comments are provided in *italic type* followed by the Navy's responses in **bold type**.

Comment #1: The Work Plan indicates that groundwater and surface water samples will be analyzed for 14 PFAS compounds. The Department has identified a full PFAS target analyte list that includes 21 analytes (see attached table). Samples collected during the PFAS groundwater investigation should include laboratory analysis of the 21 analytes included in the attached table.

Response #1: The analyte consists of the 21 analytes provided by the DEC on February 9, 2018. The text and Table 2 have been revised to reflect this change.

Comment #2: Table 2 indicates that samples will be analyzed by Method 537. Samples should be analyzed by a New York State Department of Health ELAP approved laboratory using the modified EPA Method 537. Laboratories have been able to achieve reporting limits for PFOA and PFOS of 2 ng/l (part per trillion) in water using this method.

Response #2: The analysis listed on Table 2 has been updated from "Method 537 Compounds" to "Modified Method 537 Compounds." Vista Analytical Laboratory will be used for this project and is approved under the New York State Department of Health ELAP program. Vista Analytical can achieve a detection limit of 2.74 ng/L under modified Method 537.

Comment #3: The work plan indicates that an equipment blank will be collected once per day that samples are collected with reusable equipment. Due to the possible presence of PFC materials in sampling equipment, it is recommended that equipment blanks be collected once per day even when non-reusable equipment is used during the sampling program.

Response #3: The non-reusable equipment that will come in contact with the sample is high-density polyethylene (HDPE) tubing. Although there is uncertainty with PFC materials in sampling

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equipment, the non-reusable equipment has not been found to impact sample results on other projects. One equipment blank on the HDPE tubing will be collecting during this sampling event.

Comment #4: The monitoring well MW-302 series and MW-304I2 appear on Table 2, but do not appear on Figure 3 as locations to be samples for PFAS. Please provide clarification.

Response #4: The MW-302 series and MW304I2 will not be sampled during the 2018 event and have been removed from Table 2.

Comment #5: The work plan Figure Number 3 indicates a 2017 PFAS sampling program. The date should be revised to reflect that this is a 2018 sampling program.

Response #5: Figure 3 has been revised to reflect the 2018 sampling program.

If you have any questions please contact Mr. Brian Murray, NAVFAC Mid-LANT, at Brian.S.Murray@navy.mil or (757) 341-0491.

Sincerely,

A handwritten signature in black ink, appearing to read 'David D. Brayack', written over a horizontal line.

David D. Brayack, P.E.
Project Manager

Enclosure: Final 2018 Poly- and Perfluoroalkyl Substance (PFAS) Groundwater Investigation Work Plan

Distribution (email only):
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Project File